From: Jolleen Werst

Superfund Records Manager

To:

Site File

Subj: Administrative Record Processing Packet

The attached documents were used to help determine which documents would be included in the Administrative Record/File.

The documents attached could include, emails, site index's, Admin Records Checklist Form, Request for a Superfund Administrative Record Form, handwritten notes.

A7N3

40395115 Superfund

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DUDO

4.0

REQUEST FOR A SUPERFUND ADMINISTRATIVE RECORD

Date: 7116/2012 Rec	questor: Megan Schuette	Counsel: Denise Roberts
Site Name: Pradiation - Standard Precision, Inc. (Former	CERCLIS ID# <u>\\$00009003</u>	16 ou# 00 ssid# A7N3
1. Do you want an index of documents that a	re currently in SDMS to be sent to yo	u: yes no_X
2. Is this request for an original AR? yes	•	
3. Is this request to update an existing AR Fil	le? yes no X AR#	·············
4. Type of AR you are requesting? (please ci	rcle only one of the following):	
*Removal EECA AR	File (Start of RI/FS) ROD	5-year review
In the space below list the Public Repository applease include the zip code and telephone number and name of contact if available. (If more that please indicate on back of form) Repository #1 Wiehita Department of the Physics of the Public Repository: 1900 East 9th Street 316- Wichita HS 67214 316- Date AR Needs to be at the Repository: 9 *(excluding voluntary RP Removals) **If needed	Environmental Services -268-8351	List of Doc IDs to be Included in AR: # See SOMS printout B0030849, 40348531, 40348534, 30030847, Rom Roduct (If additional room is needed please use the back of the form)
		*Please attach any new documents that you

want in the AR to this form for processing

ADMIN RECORDS CHECKLIST
Site Name: Indiation-Standard AR# (Tracking #)

ACTION	YES	NO	Former	COMPLETED
Call Repository to see if they accept CD's				
Did new documents accompany the AR Request form	1		If yes, then need to process new documents into SDMS with tracking # - MAKE SURE THEY ARE NOT ALREADY IN SDMS	
Were other documents identified to be included in the AR?			If yes, then you need to order the originals from the Records Center	7/11/12
Create AR collection in SDMS - to establish tracking number	$\sqrt{}$			7/20/12
Tracking Number added to the Maintenance Table	\			7/20/12
Documents Indexed (make sure tracking number is included in the indexing)	/			7/25/12
Documents Scanned/ E-Docs Uploaded				1
Documents QA'd				
Create Introduction – under H:\SUPR Lit\WWHY^\AR TEMPLATES – Originals	\checkmark			7/20/12
Index and Scan Introduction and Index	/			1
Run an Index Report (The docs have to be in the collection before you can run this report)	/			
Create AR Transmittal Acknowledge form (internal signature form) – under H:\SUPR Lit\WWHY^\AR TEMPLATES – Originals	1			7/20/12
Send out Email to RPM and Counsel for review				9/26/12
Create AR Transmittal Acknowledge form (repository signs and sends back) - H:\SUPR Lit\WWHY^\AR TEMPLATES – Originals	/			7/20/12
Create AR Transmittal Letter - H:\SUPR Lit\WWHY^\AR TEMPLATES - Originals	/			7/20/12
Create PDF CD's (at least 3 copies)			1-Public Repository, 1-EPA, 1-LitRoom	9/28/12
Prepare UPS				9/28/12
Send UPS with CD, AR transmittal Acknowledge Form, prepaid self addressed envelope (in small print write AR# in lower left corner of this envelope) and AR transmittal Letter			Make a copy of the signed AR transmittal form and staple EPA's copy of the UPS slip to it and put it in the Black Box for Daily Docs	9/20/12
File the Introduction and Index in the boxes in the litigation room – until AR is final.				9/28/12
Send Email to OPA – site name and type of AR and date it was sent to the repository - R7OPA@EPA				9/28/12
Update Spread Sheets (2)	1/		K:\SUPR Lit\WWHY^\Collections Tracking.xls and FY(YR) AR Printed Spreadsheet on Jolleen's Desk or by AR's	9/29/12

Search Results Page

40349045

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SCHUETTE, MEGAN

★ Keyword: AR Tracking Type: AR#_REGION_07 Tracking Number: 62623:AR#_REGION_07
 Displaying 1 - 35 of 35 documents

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Region	Doc ID ^	NR/AR	Action Type	Doc Date	<u>Title</u>	Images
07	114322	Δ	di	02-01-2000	Expanded Site Inspection Report (w/o Figures 11 and 12)	132 C
07	30030847	4		02-12-1998	Memorandum regarding the Use of Soil Cleanup Criteria in 40 CFR Part 192 as Remediation Goals for CERCLA sites	B 6 💃
07	6 30030848	A		04-11-2000	Memorandum regarding Remediation Goals for Radioactively Contaminated CERCLA Sites using the Benchmark Dose Cleanup Criteria in 10 CFR Part 40 Appendix A, I, Criterion 6(6)	₽ 9 ≯
07	30030849	0	•	12-01-1990	Toxicological Profile for Radium	135
07	<u>30098966</u>	A	•	06-08-2009	Email regarding disposal of waste	≥ 2.
07	<u>30192869</u>	A		01-06-2010	Letter transmitting the Removal Site Evaluation Trip Report, Revision 01	156 ©
07	<u>30245191</u>	A	AM .	06-15-2012	Action Memorandum for a fund-lead, time-critical removal ation (w/o Confidential Enforcement Addendum)	₽ 9 ©
07	<u>30246061</u>	A		06-21-2012	Letter requesting potential ARARS and transmitting draft Action Memorandum and Potential ARAR Tables	≥ 14 C
07	30246062	- a		07-27-2012	Memorandum containing evaluation of Kansas list of regulations for Applicable or Relevant and Appropriate Requirements (ARARs)	B 2 0
07	<u>30246791</u>	, A		06-01-2012	Fact Sheet - EPA Removal Site Evaluation to Begin - June 2012	∄ 2 ○
07	<u>30246792</u>	A		07-02-2012	Letter transmitting applicable or relevant and appropriate state requirements (ARARs) tables	∌ 3 €
07	30246793	A	,	06-05-2012	Figure 1 Proposed Areas of Excavation	₽ 1 ○
07	3024 794	A	•	08-26-2011	104(e) response received from Depew, Gillen, Rathbun & McInteer, LC	182 C
07	30249795	A		08-29-2011	104(e) response received from Depew, Gillen, Rathbun & McInteer, LC	₽ O
07	<u>30246796</u>	Δ		01-01-1111	Introduction and Index for the Removal	B 8 6

,	Region	Doc ID ^	NR/AR	Action Type	Doc Date	<u>Title</u>	Images	
						Administrtive Record #62623		
	. 07	<u>30246808</u>	A		07-27-2012	Memorandum containing evaluation of Kansas list of regulations for Applicable or Relevant and Appropriate Requirements (ARARs)	2 Q	
	07	<u>40301735</u>	A		03-01-2007	Unified Focus Assessment Report - March 2007	134 O	
	07	40301737	A		11-20-2008	Letter of Referral for completion of removal action	2 1, 0	
	07	40301738	Δ		11-20-2008	Letter regarding the completion of the Unified Focused assessment (UFA)	® 3 O	
	07	<u>40309801</u>	A		02-25-2009	Memorandum containing approval of the Addendum to the Quality Assurance Project Plan (QAPP), with general comments	图 23 〇	
	07	40314543	A		05-26-2009	Memorandum transmitting the Radiochemical result samples	≥ 28	
٠	07	40314544	A	,	05-28-2009	Memorandum transmitting the Radiochemical result samples	æ 60 6	
	07	40314579	· 🗛		06-02-2009	Memorandum transmitting the Radiochemical result samples	≥ 36 O	•
	07	40318512	A		03-01-2009	Fact Sheet regarding EPA Removal Site Evaluation to Begin - March 2009	2 C	
	07	40343159	A		02-28-2011	104(e) Information request to NCR corporation	B 19 🖚 🔭	
	07	40346226	Δ,		10-13-2010	Memorandum Approving the Addendum to the Quality Assurance Project Plan (QAPP) for the Removal Site Assessment activities	8 1 0	
	07	<u>40346227</u>	۵		10-13-2010	Addendum to the Generic Quality Assurance Project Plan (QAPP) for Superfund Site Assessment and Targeted Brownfields Assessment Activities (July 2007)	№ 1 ⊘	
	07	40346228	Δ	·	05-17-2010	Letter transmitting the Addendum to the Quality Assurance Project Plan (QAPP) for additional Removal Site Assessment activities	≥ 30 ⊘	
	07	<u>40347462</u>	A		01-04-2011	Memorandum transmitting the Sample Analysis Results for ASR #: 4948	≥ 51 /	
	07	40328531	•		06-24-2009	Letter previding historical information regarding the site including corporation transfers anothe nature of the business conducted	· 28 3 × 3	
	07	403/8534	0		06-24-2009	Letter providing historical information regarding the site including corporation transfers and the nature of the business conducted with related documentation	382	
	07	40340016	A	_	03-31-2011	104(e) response eceived from NCR Corporation	125	
	07	40350650	a		06-22-2011	104(e) information request to M.J. Edwards III	B 8 C	

0/06/0010 1.62 73 4

Region	Doc ID ^	NR/AR	Action Type	Doc Date	<u>Title</u>	Images
07	40330651	0	•	06-22-2011	104(e) information request to M.J. Edwards III	№ 8 🕏
07	<u>40354449</u>	å		09-19-2011	Letter transmitting the Groundwater Investigation Trip Report	≥ 56 ○

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Re: Ratiation-Standard Precision AR#62623

Megan Schuette to: Pamela Houston

Cc: Jolleen Werst

09/25/2012 10:59 AM

Hi Pam.

Please see below. Let me know if you have any questions.

Thanks, Megan

Pamela Houston

Good Afternoon Megan, Can you take a look at...

09/24/2012 02:14:44 PM

From:

Pamela Houston/R7/USEPA/US

To: Cc: Megan Schuette/R7/USEPA/US@EPA Jolleen Werst/R7/USEPA/US@EPA

Date:

09/24/2012 02:14 PM

Subject:

Ratiation-Standard Precision AR#62623

Good Afternoon Megan,

Can you take a look at the following doc ids and let me know which one's you would like to keep in the Administrative Record and which one's can be removed because a few appear to be duplicates.

30030852 & 30030848 - appear to be duplicates, keep 30030848

40314543 & 40314544 & 40314579 - all three are ok...three different documents...three different analyses were performed, one doc for each analysis type

40348534 & 40348531 - I can't find these documents in SDMS for Standard Precision

350651 & 40350650 - both ok...two different documents...one for CECO company and one for the living

246794 & 30246795 - both ok...the first is the response and the second is additional material they sent couple days later that they forgot in the first response

3024808 & 30246062 - same document, but one Randy did for Products and I did for Precision, keep 30246062

Thank You

Pamela Houston **US EPA Environmental Protection Specialist** 901 N. 5th St. Kansas City, KS 66101 913-551-7699 913-551-9699 fax

Region 7 EPA will be relocating its office from the current Kansas City, KS location to Lenexa, KS. The Region 7 office will be in full operation at the Lenexa, KS building on October 15. The Regional Office is expecting a seamless transition. All phone numbers will remain the same. Please mail correspondence to the following address after October 15:

Environmental Protection Agency Region 7 Superfund Division 11201 Renner Boulevard Lenexa KS 66219

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Keyword: ar Tracking Type: AR#_REGION_07 Tracking Number: 62623:AR#_REGION_07

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	Region	Doc ID	NR/AR	Action Type	Doc Date ^	<u>Title</u>	lmages
	07	<u>30246796</u>	Δ		01-01-1111	Introduction and Index for the Removal Administrtive Record #62623	≥ 8
	07	30030849	A		12-01-1990	Toxicological Profile for Radium	≥ 135
	07	30030847	A		02-12-1998	Memorandum regarding the Use of Soil Cleanup Criteria in 40 CFR Part 192 as Remediation Goals for CERCLA sites	E 6
	07	<u>114322</u>	A ·		02-01-2000	Expanded Site Inspection Report (w/o Figures 11 and 12)	132
ŧ	07	30030852	A		04-11-2000	Memorandum regarding Remediation Goals for Radioactively Contaminated CERCLA Sites using the Benchmark Dose Cleanup Criteria in 10 CFR Part 40 Appendix A, I, Criterion 6(6)	₽ 9
	07	30030848	A		04-11-2000	Memorandum regarding Remediation Goals for Radioactively Contaminated CERCLA Sites using the Benchmark Dose Cleanup Criteria in 10 CFR Part-40 Appendix A, I, Criterion 6(6)	A 9
	07	<u>40301735</u>	Δ		03-01-2007	Unified Focus Assessment Report - March 2007	≥ 134
	07	40301737	A		11-20-2008	Letter of Referral for completion of removal action	2 1
	07	40301738	A		11-20-2008	Letter regarding the completion of the Unified Focused assessment (UFA)	2 3
	07	<u>40309801</u>	A		02-25-2009	Memorandum containing approval of the Addendum to the Quality Assurance Project Plan (QAPP), with general comments	2 3
	07	40318512	A		03-01-2009	Fact Sheet regarding EPA Removal Site Evaluation to Begin - March 2009	2 2
	07	40314543	A		05-26-2009	Memorandum transmitting the Radiochemical result samples	№ 28
	07	40314544	A		05-28-2009	Memorandum transmitting the Padiochemical result samples	≥ 60
	07	40314579	A		06-02-2009	Memorandum transmitting the Radiochemical	№ 36

. result samples

	07	30098966	a		06-08-2009	Email regarding disposal of waste	₽ 2
[07	40348534	a		06-24-2009	Letter providing historical information regarding the site including corporation transfers and the nature of the business conducted with related documentation	382
	07	40348531	A		06-24-2009	Letter providing historical information regarding the site including corporation transfers and the nature of the business conducted	№ 3
	07	30192869	A	•	01-06-2010	Letter transmitting the Removal Site Evaluation Trip Report, Revision 01	156
	07	40346228	A		05-17-2010	Letter transmitting the Addendum to the Quality Assurance Project Plan (QAPP) for additional Removal Site Assessment activities	№ 30
	07	40346227	Δ		10-13-2010	Addendum to the Generic Quality Assurance Project Plan (QAPP) for Superfund Site Assessment and Targeted Brownfields Assessment Activities (July 2007)	2 1
	07	<u>40346226</u>	A		10-13-2010	Memorandum Approving the Addendum to the Quality Assurance Project Plan (QAPP) for the Removal Site Assessment activities	2 1
	07	<u>40347462</u>	a		01-04-2011	Memorandum transmitting the Sample Analysis Results for ASR #: 4948	æ 51
	07	40345159	A	•	02-28-2011	104(e) information request to NCR corporation	Æ 19
	07	<u>40349016</u>	a		03-31-2011	104(e) response received from NCR Corporation	125
(07	40350651	A		06-22-2011	104(e) information request to M.J. Edwards III	№ 8
	07	40350650	A		06-22-2011	104(e) information request to M.J. Edwards III	≥ 8
Ì	07	30246794	A		08-26-2011	104(e) response received from Depew, Gillen, Rathbun & McInteer, LC	182
Į	07	30246795	A		08-29-2011	104(e) response received from Depew, Gillen, Rathbun & McInteer, LC	443
	07	40354449	A		09-19-2011	Letter transmitting the Groundwater Investigation Trip Report	№ 56
	07	<u>30246791</u>	۵		06-01-2012	Fact Sheet - EPA Removal Site Evaluation to Begin - June 2012	₽ 2
	07	<u>30246793</u>	A		06-05-2012	Figure 1 Proposed Areas of Excavation	₽ 1
	07	<u>30245191</u>	A	AM	06-15-2012	Action Memorandum for a fund-lead, time- critical removal ation (w/o Confidential Enforcement Addendum)	图 9
	07	<u>30246061</u>	Δ		06-21-2012	Letter requesting potential ARARS and transmitting draft Action Memorandum and Potential ARAR Tables	<u>.</u> 14

	07	30246792	A	07-02-2012	Letter transmitting applicable or relevant and appropriate state requirements (ARARs) tables	<u> </u>	3
A	07 -	30246808	Δ	07-27-2012	Memorandum containing evaluation of Kansas list of regulations for Applicable or Relevant and Appropriate Requirements (ARARs)	*	2
	07	<u>30246062</u>	A	07-27-2012	Memorandum containing evaluation of Kansas list of regulations for Applicable or Relevant and Appropriate Requirements (ARARs)	&	2
1					and Appropriate Requirements (ARARS)		

SCHUETTE, MEGAN

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						 ,
Region	Doc ID	NR/AR	Action Type	Doc Date	<u>Title</u>	Images
07 .	40290033			01-01-1111	Identified Sites List Information	≥ 2
07	40289889			01-01-1111	Identified Sites List Information	₽ 3
07	<u>30098951</u>			01-01-1111	Log book	₽ 8
07	114316	`		10-01-1999	REMEDIAL SITE ASSESSMENT DECISION - EPA REGION VII	2 2
07 (114322	,		02-01-2000	RE: EXPANDED SITE INSPECTION	264
07	114323	×		03-01-2000	RE: PRE-SCORE SHEETS	2 44
07	114320		·	08-15-2000	RE: REMEDIAL SITE ASSESSMENT DECISION - EPA REGION VII	2 2
07	197445			02-12-2002	REMEDIAL SITE ASSESSMENT DECISION	
. 07	40034029			11-29-2002	REMEDIAL SITE ASSESSMENT DECISION FORM	2 1
07	<u>40113998</u>		,	10-29-2003	FREEDOM OF INFORMATION ACT REPORT FOIA NUMBER 04-00019	· 图 1
07	40201606			04-20-2004	REMEDIAL SITE ASSESSMENT DECISION FOR THE K-42 & WEST STREET SITE	2 1
07	40301735)		03-01-2007	Unified Focus Assessment Report - March 2007	134
07	<u>40348928</u>			04-29-2008	Letter restating and supplements a letter of April 1997 which discussed the corporate history of NCR and demonstrating that NCR has never been an owner or operator with respect to any radium manufacturing at the site	∌ 205
07	40349042			09-18-2008	Letter discussing historical information related to the site recently provided and summarizing the arguments/facts presented within	⊞ 225
07	40301739			11-20-2008	Site Discovery Entry Form	₽ 5
97	40301736			11-20-2008	Remedial Site Assessment Decision	2 1
07	40301738)		.11-20-2008	Letter regarding the completion of the Unified Focused assessment (UFA)	Æ 3

Region	Doc ID	NR/AR	Action Type	Doc Date ^	<u>Title</u>	Images
07	40301737)	•	11-20-2008	Letter of Referral for completion of removal action	2 1
07	40301740			11-20-2008	KDHÉ Sector Assessment Decision	29 1
07	30192868		,	11-20-2008	Email transmitting the Referral documents for the three sites	△ 15
07	40354033			· 11-20-2008	Remedial Site Assessment Decision	2 1
07	<u>30192867</u>		•	12-15-2008	Email containing Site ID information	2 1
07	30192866			12-22-2008	Email summarizing an outdoors assessment from 12/19/08	2 1
07	30192865			01-27-2009	Email providing notification that a Removal Assessment will be completed	₽ 1
07	<u>30192864</u>		•	01-27-2009	Email providing an update on the sites	& 1
07	30192863			02-20-2009	Email transmitting Figures 1, 2, and 3: Site Layout	≥ 5
. 07	40309801			02-25-2009	Memorandum approving the Addendum to the Quality Assurance Project Plan (QAPP), with Comment	≥ 23
07	30192861			02-26-2009	Email transmitting the NAREL Analytical Request Form	2 10
07	<u>30192862</u>			02-26-2009	Email regarding and transmitting the EPA-approved Quality Assurance Project Plan (QAPP) for the three sites	≥ 24
07	40318512			03-01-2009	Fact Sheet - EPA Removal Site Evaluation to Begin - March 2009	≥ 2
07	30192860		·	03-04-2009	Email containing information on the EPA-approved Quality Assurance Project Plan (QAPP) for the three sites	· 🚨 2
07	40318513			03-12-2009	Signed Access Agreement for 4105 West Pawnee	2 2
07	<u>30192858</u>			03-20-2009	Email discussing upcoming site activities	≥ 3
07	<u>30192857</u>			03-20-2009	Email transmitting the March 2009 Fact Sheets for the three sites	2 7
07	<u>30192859</u>			03-20-2009	Email transmitting the March 2009 Fact Sheets . for the three sites	3 7
07	30192856		,	03-29-2009	Email containing the On-Scene Coordinator (OSC) contact information	₽ 3
. 07	<u>30192852</u>			04-01-2009	Email transmitting a spreadsheet showing lab sample data	₽ 3
. 07	<u>30192854</u>			04-01-2009	Email transmitting a Site Notes	≥ 3
07	<u>30192853</u>			04-01-2009	Email transmitting a spreadsheet showing all of the lab samples	₽ 4

Region	Doc ID	NR/AR	Action Type	Doc Date ^	Title	Images
07	<u>30192855</u>		•	04-01-2009	Email transmitting site photographs	≥ 6
07	30192851			. 04-06-2009	Email transmitting a spreadsheet showing all samples submitted to NAREL to be analyzed by the alpha method	2 4
07	<u>30192850</u>			04-10-2009	Email transmitting the Sample data for analysis	A 4
07	30098969			04-22-2009	Email transmitting the E-PERM results for all three sites	2 2
07	<u>30098968</u>		. •	04-30-2009	Email regarding information to include in log book	2 1
07	<u>30098967</u>			05-22-2009	Email transmitting old site photographs	2 11
07 (40314543)		05-26-2009	Memorandum transmitting the Radiochemical Results for the Kansas Radium Dial Site Samples	≥ 28
	40314544)		05-28-2009	Memorandum transmitting the Radiochemical Results for the Kansas Radium Dial Site Samples	№ 60
07	40314579)		06-02-2009	Memorandum transmitting the Radiochemical Results for the Kansas Radium Dial Site Samples	№ 36
02 V	30098966	\mathcal{S}		06-08-2009	Email regarding information the state may have provided about the containing/disposal of radium-contaminated waste	· 🗎 2
07	<u>30098965</u>	,		06-19-2009	Email transmitting the indoor readings	2 5
07 .	40349043			06-24-2009	Letter providing historical information regarding the site including corporation transfers and the nature of the business conducted with related documentation	& 381
07	30098964			09-23-2009	Email containing estimated costs associated with the site	₽ 1
07	30098963			11-13-2009	Email transmitting information on the new Radium limits	A 6
07	30098962			12-08-2009	Email regarding accessing the Expanded Site Inspection conducted by KDHE	2 1
. 07	30192869)		01-06-2010	Letter transmitting the Removal Site Evaluation Trip Report, Revision 01	156
07	<u>30098961</u>			01-08-2010	Email regarding revisions to the Site Report	A 4
07	30098960		•	01-12-2010	Email discussing possible groundwater sampling objectives	₽ 4
07	30098959			02-16-2010	Email transmitting Figure 1: Surface Soil Gamma Survey with monitoring well locations circled	. 2
. 07	<u>30098958</u>			03-18-2010	Email regarding 4105 W. Pawnee having two parcels	& 3

Region	Doc ID	NR/AR	Action Type	Doc Date ^	<u>Title</u>	Images
07	<u>30098956</u>			03-19-2010	Email transmitting the new parcel information for 4105 W. Pawnee	≥ 3
07	<u>30098957</u>			03-19-2010	Email transmitting Figure 2: Site Layout Map	2 2
07	<u>30098955</u>			03-22-2010	Email transmitting the revised Figure 3: Gamma Survey Results Map	2 2
07	30098954			04-29-2010	Email regarding finalizing the Quality Assurance Project Plan (QAPP) for the groundwater sampling	2 4
07	30098953			05-05-2010	Email transmitting the Superfund Extended Analytical Services Request (S-ASR) Form, Activity #: 0130	₽ 3
07	40346228).		05-17-2010	Letter transmitting the Addendum to the Quality Assurance Project Plan (QAPP) for additional Removal Site Assessment activities	Æ 29'
07	<u>30098952</u>		·	05-18-2010	Email transmitting the Addendum to Quality Assurance Project Plan (QAPP) for additional Removal Site Reassessment activities	2 .31
07	40346227	•	٠	10-13-2010	Addendum to the Generic Quality Assurance Project Plan (QAPP) for Superfund Site Assessment and Targeted Brownfields Assessment Activities (July 2007)	25 1
07(1	40346226)	· .	10-13-2010	Memorandum Approving the Addendum to the Quality Assurance Project Plan (QAPP) for the Removal Site Assessment activities	· E 1
07	40363396			10-20-2010	Travel Voucher #: MSWICHITAKS110110_V01 for Schuette, Megan and related documents	2 1
07	40347462)		01-04-2011	Memorandum transmitting the Sample Analysis Results for ASR #: 4948	2 51
07	40345159	>		02-28-2011	104(e) information request to attorneys from Foulston & Sifking LLP and Langsam Stevens & Silver, LLP	2 19
07	40349016)		03-31-2011	104(e) response received from NCR Corporation	125
07	40349044	•	,	04-19-2011	Letter responding to a letter of 11/29/10 sent on behalf of the Raytheon Company	₽ 126
07	40349045	M		04-26-2011	Letter transmitting a letter of 04/29/08 which discussed the corporate history of NCR and demonstrating that NCR has never been an owner or operator with respect to any radium manufacturing at the site	216
07	40350650	<u>)</u>		06-22-2011	104(e) information request to M.J. Edwards III	8 8
07 (V	40350651)		06-22-2011	104(e) information request to M.J. Edwards III	Æ 8
07	<u>30228994</u>			07-29-2011	Enforcement Action Memorandum for a Potentially responsible Party (PRP)-lead, time critical Removal Action (concurrence copy)	2 10

Region	<u>Doc ID</u>	NR/AR	Action Type	Doc Date ^	<u>Title</u>	Images
07	<u>30244249</u>	×		07-29-2011	Enforcement Addendum to the Enforcement Action Memorandum for a Potentially responsible Party (PRP)-lead, time critical Removal Action	₽ 2
07	30228993	,		07 -29-2 011	Enforcement Action Memorandum for a Potentially responsible Party (PRP)-lead, time critical Removal Action	₽ 9
	40354449)		09-19-2011	Letter transmitting the Groundwater Investigation Trip Report	₽ 56
67	30245191)	AM	06-15-2012	Action Memorandum for a fund-lead, time-critical removal ation (w/o attachment)	2 9
07	30245192	X	АМ	06-15-2012	Enforcement Addendum to the Action Memorandum for a fund-lead, time-critical removal action	2 1
07	<u>30245190</u>			06-15-2012	Action Memorandum for a fund-lead, time-critical removal ation (concurrence copy)	1 0

Re: Radiation-Standard Precision AR#62623

Megan Schuette to: Pamela Houston

Cc: Jolleen Werst

09/28/2012 10:29 AM

Documents 40301737 and 40301738 were sent to the records center without attachments. Please add these two documents to AR# 62623 as they are.

Megan Schuette Federal On-Scene Coordinator U.S. EPA Region 7 (SUPR/PPSS) 901 N. 5th Street Kansas City, KS 66101 913-551-7630 (office) 913-375-5182 (cell)

Pamela Houston

Megan, Can you briefly describe what we discus... 09/27/2012 05:37:06 PM

From:

Pamela Houston/R7/USEPA/US

To:

Megan Schuette/R7/USEPA/US@EPA

Cc:

Jolleen Werst/R7/USEPA/US@EPA

Date:

09/27/2012 05:37 PM

Subject:

Radiation-Standard Precision AR#62623

Megan,

Can you briefly describe what we discussed over the phone today regarding doc ids 40301737 and 40301738 and the missing attachments. I need a description for the record.

Thank You

Pamela Houston **US EPA Environmental Protection Specialist** 901 N. 5th St. Kansas City, KS 66101 913-551-7699 913-551-9699 fax

Region 7 EPA will be relocating its office from the current Kansas City, KS location to Lenexa, KS. The Region 7 office will be in full operation at the Lenexa, KS building on October 15. The Regional Office is expecting a seamless transition. All phone numbers will remain the same. Please mail correspondence to the following address after October 15:

Environmental Protection Agency Region 7 Superfund Division 11201 Renner Boulevard Lenexa KS 66219



Ratiation-Standard Precision AR#62623

Pamela Houston to: Megan Schuette

Cc: Jolleen Werst

Good Afternoon Megan,

Can you take a look at the following doc ids and let me know which one's you would like to keep in the Administrative Record and which one's can be removed because a few appear to be duplicates.

30030852 & 30030848

40314543 & 40314544 & 40314579

40348534 & 40348531

40350651 & 40350650

30246794 & 30246795

30246808 & 30246062

Thank You

Pamela Houston US EPA **Environmental Protection Specialist** 901 N. 5th St. Kansas City, KS 66101 913-551-7699 913-551-9699 fax

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Region 7 Superfund Division 11201 Renner Boulevard Lenexa KS 66219

09/24/2012 02:14 PM



Fw: Radiation-Standard Precision, Inc. (Former) AR#62624 CONFIDENTIAL Administrative Record

Jolleen Werst to: Michele Drennen, Pamela Houston

09/26/2012 02:23 PM

Please see below.

Jolleen Werst **Environmental Protection Agency** SUPR/MOKS 901 North 5th Street Kansas City, KS 66101 913-551-7108 913-551-7063 (fax)

---- Forwarded by Jolleen Werst/R7/USEPA/US on 09/26/2012 02:22 PM -----

From:

Denise Roberts/R7/USEPA/US

To:

Jolleen Werst/R7/USEPA/US@EPA

Cc:

Randy Schademann/SUPR/R7/USEPA/US@EPA, Megan Schuette/R7/USEPA/US@EPA

Date:

09/26/2012 01:58 PM

Subject:

Re: Fw: Radiation-Standard Precision, Inc. (Former) AR#62624 CONFIDENTIAL Administrative

I reviewed Standard Precision AR and with redacted doc. is ok as soon as Randy and Megan get same doc's in their respective AR's.

** PLEASE NOTE THAT REGION VII IS RELOCATING.

EPA, Region VII, will be relocating its office from the current Kansas City, KS location to Lenexa, KS. The Region VII office will be in full operation at the Lenexa, KS building on October 15, 2012.

All phone number and email addresses will remain the same. Please mail correspondence to the following address after October 15:

Denise Roberts Senior Assistant Regional Counsel Office of Regional Counsel U.S. Environmental Protection Agency 11201 Renner Road Lenexa, Kansas 66219 roberts.denise@epa.gov (913)551-7559

fax: (913)551-7925

Jolleen Werst

Denise Per your request here is the email again.... 09/26/2012 12:57:41 PM

From:

Jolleen Werst/R7/USEPA/US

To:

Denise Roberts/R7/USEPA/US@EPA

Cc:

Pamela Houston/R7/USEPA/US@EPA, DeAndre Singletary/SUPR/R7/USEPA/US@EPA

Date: Subject: 09/26/2012 12:57 PM

Fw: Radiation-Standard Precision, Inc. (Former) AR#62624 CONFIDENTIAL Administrative Record

Denise

Per your request here is the email again. Please let me know if you need any help.

Thanks

Jolleen Werst
Environmental Protection Agency
SUPR/MOKS
901 North 5th Street
Kansas City, KS 66101
913-551-7108
913-551-7063 (fax)
----- Forwarded by Jolleen Werst/R7/USEPA/US on 09/26/2012 12:57 PM -----

From:

Pamela Houston/R7/USEPA/US

To:

Megan Schuette/R7/USEPA/US@EPA, Denise Roberts/R7/USEPA/US@EPA

Cc:

Jolleen Werst/R7/USEPA/US@EPA, DeAndre Singletary/SUPR/R7/USEPA/US@EPA

Date:

09/26/2012 11:19 AM

Subject:

Radiation-Standard Precision, Inc. (Former) AR#62624 CONFIDENTIAL Administrative Record

Good Morning,

The above AR has been created. Go into SDMS and click on extended search, and in

Tracking Type: - enter **AR** and click the binoculars select R07: AR# (ADMIN RECORD #)

click OK

Tracking Number: - enter 62624 and click the binoculars

select R07: 62624:

click OK

Then click



The documents that are included in this AR will display after the search is completed.

In addition, attached below is the Superfund Acknowledgement Form - please print this form, sign off (if the AR is ok) and then pass it on to the attorney

If you have corrections, additional documents you want to add please just let me know. (Please read the introduction page and make sure it is OK)

[attachment "CONFIDENTIAL Superfund Acknowledgement Form.pdf" deleted by Denise Roberts/R7/USEPA/US]

Pamela Houston US EPA Environmental Protection Specialist 901 N. 5th St. Kansas City, KS 66101 913-551-7699 913-551-9699 fax

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Environmental Protection Agency
Region 7
Superfund Division
11201 Renner Boulevard
Lenexa KS 66219



Fw: Standard Precision- Standard Products AR

Jolleen Werst to: Michele Drennen, Pamela Houston

Cc: DeAndre Singletary

09/26/2012 02:22 PM

Please see below and work together on this.

Jolleen Werst
Environmental Protection Agency
SUPR/MOKS
901 North 5th Street
Kansas City, KS 66101
913-551-7108
913-551-7063 (fax)

---- Forwarded by Jolleen Werst/R7/USEPA/US on 09/26/2012 02:22 PM -----

From:

Denise Roberts/R7/USEPA/US

To:

werst.jolleen@epa.gov, schademann.randy@epa.gov, Megan Schuette/R7/USEPA/US@EPA

Date:

09/26/2012 01:57 PM

Subject:

Standard Precision-Standard Products AR

Jolleen: For redacted doc. copy also needs to go into Standard Products.

Randy and Megan: Contents of your AR's need to match as much as possible except for site specific investigations and 104(e)'s sent out for only specific parties. For ex: I don't have file in office any more but think Cessna 104(e) only belonged in one site- you can tell by looking at "re" on each 104(e). I would put NCR's 104(e) and all their responses and letters in both. Guidance doc's, technical doc on risks for radium need to be same.

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Denise Roberts
Senior Assistant Regional Counsel
Office of Regional Counsel
U.S. Environmental Protection Agency
11201 Renner Road
Lenexa, Kansas 66219
roberts.denise@epa.gov
(913)551-7559

fax: (913)551-7925



Re: Radiation-Standard Precision, Inc. (Former) AR#62624 CONFIDENTIAL Administrative Record

Denise Roberts to: Jolleen Werst

09/26/2012 01:40 PM

Cc: Pamela Houston, Megan Schuette, DeAndre Singletary

Here it is

ncr-ltr-AR-redact.doc.doc

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fax: (913)551-7925

Jolleen Werst

Denise Here is doc id 40348531 - please redact... 09/26/2012 01:23:22 PM

From:

Jolleen Werst/R7/USEPA/US

To:

Denise Roberts/R7/USEPA/US@EPA

Cc:

Pamela Houston/R7/USEPA/US@EPA, Megan Schuette/R7/USEPA/US@EPA, DeAndre

Singletary/SUPR/R7/USEPA/US@EPA

Date:

09/26/2012 01:23 PM

Subject:

Re: Radiation-Standard Precision, Inc. (Former) AR#62624 CONFIDENTIAL Administrative Record

Denise

Here is doc id 40348531 - please redact and email this back to us and we will create a new document [attachment "40348531.pdf" deleted by Denise Roberts/R7/USEPA/US] Jolleen Werst **Environmental Protection Agency** SUPR/MOKS 901 North 5th Street Kansas City, KS 66101

913-551-7108

913-551-7063 (fax)

Denise Roberts

Remove handwritten note at top of doc. 4034853... 09/26/2012 01:17:38 PM

From:

Denise Roberts/R7/USEPA/US

To:

Pamela Houston/R7/USEPA/US@EPA

Cc:

Megan Schuette/R7/USEPA/US@EPA, Jolleen Werst/R7/USEPA/US@EPA, DeAndre

Singletary/SUPR/R7/USEPA/US@EPA

Date:

09/26/2012 01:17 PM

Subject: Re: Radiation-Standard Precision, Inc. (Former) AR#62624 CONFIDENTIAL Administrative Record

Remove handwritten note at top of doc. 40348531- call me for reason if need one. Thanks. Rest is ok.

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11201 Renner Road
Lenexa, Kansas 66219
roberts.denise@epa.gov
(913)551-7559

fax: (913)551-7925

Pamela Houston

Good Morning, The above AR has been created...

09/26/2012 11:19:51 AM

From:

Pamela Houston/R7/USEPA/US

To:

Megan Schuette/R7/USEPA/US@EPA, Denise Roberts/R7/USEPA/US@EPA

Cc:

Jolleen Werst/R7/USEPA/US@EPA, DeAndre Singletary/SUPR/R7/USEPA/US@EPA

Date:

09/26/2012 11:19 AM

Subject:

Radiation-Standard Precision, Inc. (Former) AR#62624 CONFIDENTIAL Administrative Record

Good Morning,

The above AR has been created. Go into SDMS and click on extended search, and in

Tracking Type: - enter AR and click the binoculars select R07: AR# (ADMIN RECORD #)

click OK

Tracking Number: - enter 62624 and click the binoculars

select R07: 62624:

click OK

Then click



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[attachment "CONFIDENTIAL Superfund Acknowledgement Form.pdf" deleted by Denise Roberts/R7/USEPA/US]

Pamela Houston US EPA Environmental Protection Specialist 901 N. 5th St. Kansas City, KS 66101 913-551-7699 913-551-9699 fax

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Environmental Protection Agency
Region 7
Superfund Division
11201 Renner Boulevard
Lenexa KS 66219



Re: Radiation-Standard Precision, Inc. (Former) AR#62624 CONFIDENTIAL Administrative Record

Jolleen Werst to: Denise Roberts
Cc: Pamela Houston, Megan Schuette, DeAndre Singletary

09/26/2012 01:23 PM

Denise

Here is doc id 40348531 - please redact and email this back to us and we will create a new document

40348531.pdf
Jolleen Werst
Environmental Protection Agency
SUPR/MOKS
901 North 5th Street
Kansas City, KS 66101
913-551-7108
913-551-7063 (fax)

Denise Roberts

Remove handwritten note at top of doc. 4034853...

09/26/2012 01:17:38 PM

From:

Denise Roberts/R7/USEPA/US

To:

Pamela Houston/R7/USEPA/US@EPA

Cc:

Megan Schuette/R7/USEPA/US@EPA, Jolleen Werst/R7/USEPA/US@EPA, DeAndre

Singletary/SUPR/R7/USEPA/US@EPA

Date:

09/26/2012 01:17 PM

Subject:

Re: Radiation-Standard Precision, Inc. (Former) AR#62624 CONFIDENTIAL Administrative Record

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11201 Renner Road
Lenexa, Kansas 66219
roberts.denise@epa.gov
(913)551-7559

fax: (913)551-7925

Pamela Houston

Good Morning, The above AR has been created...

09/26/2012 11:19:51 AM



June 24, 2009

Via U.S. First Class Mail
Denise Roberts, Esq.
USEPA REGION 7
901 North Fifth Street
Mail Code: CNSLSPFD
Kansas City, KS 66101

Stransfu of is Preuen dielocation as dividend or PZ.

Re:

650 E. Gilbert St., Wichita, Kansas ("East Gilbert Street Site")
4105-4219 W. Pawnee, Wichita, Kansas ("West Pawnee Street Site")

Dear Ms. Roberts:

I represent NCR Corporation (NCR) with respect to a number of environmental matters. David Traster, Esq., who also represents NCR, informed me that he spoke to you briefly by telephone recently about the two sites referenced above (Sites). As a follow up to that conversation, I am writing to bring to your attention some pertinent information regarding the history of these Sites.

The Kansas Department of Health and Environment (KDHE) has asserted that the Sites are contaminated with radium as the result of actions of Electronic Communications, Inc. (ECI) or its subsidiaries or predecessors beginning in the 1950s.

The following facts are derived from contemporaneous documents that we have provided to KDHE and will share with you at an appropriate time:

In the 1950s, a company called Standard Products, Inc. was in the business of painting aircraft dials with a radioactive luminous compound. The painting was done at the East Gilbert Street Site.

In 1962, Standard Products, Inc. moved its radium operations from the East Gilbert Street Site to the West Pawnee Street Site. By this time, Standard Products, Inc. had become a subsidiary of ECI. The next year, Standard Products, Inc. changed its name to Standard Precision, Inc.

Denise Roberts June 26, 2009 page 2

At least by 1965, Standard Precision, Inc. had stopped painting radium dials but may have continued to strip radium from used dials. That same year, ECI, Standard

Precision, Inc.'s sole shareholder, dissolved Standard Precision, Inc. ECI continued to operate the Standard Precision businesses under the name "Standard Precision Division." All radium stripping operations ceased by 1969 or before.

In September 1968, NCR acquired approximately 97% of the stock in ECI in a stock-for-stock transaction. In 1971, NCR acquired ECI's remaining outstanding shares, making it a wholly owned, but still fully separate subsidiary.

In July 1976, NCR entered into an agreement to sell all of ECI's stock to E-Systems, Inc. The sale agreement was consummated and on September 1, 1976, ECI was merged into its new owner, E-Systems, Inc. During the period between 1968, when NCR initially purchased the stock of ECI, and 1976, when NCR's sold all of ECI's stock to E-Systems, Inc., NCR always maintained ECI as a separate corporation and never merged it into NCR.

In 1995, Raytheon Corporation acquired E-Systems, Inc. and then in 2001, Raytheon and E-Systems were merged. Any liability created by radium-related operations at both of these Sites thus flows in a direct and unbroken chain to Raytheon.

Under basic principles of corporate law, NCR is not responsible for the liabilities of ECI, its former subsidiary. "It is a general principle of corporate law deeply ingrained in our economic and legal systems that a parent corporation (so-called because of control through ownership of another corporation's stock) is not liable for the acts of its subsidiaries." ColtTech, LLC v. JLL Partners, Inc., 538 F. Supp.2d 1355, 1358 (D. Kan. 2008), quoting United States v. Bestfoods, 524 U.S. 51, 61, but applying Kansas law. See also, Damman v. Southern Kansas Stage Lines Co., 143 Kan. 642, 56 P.2d 71 (1936) and Comstock v. Great Lakes Distrib. Co., 209 Kan. 306, 496 P.2d 1308 (1972). Raytheon, on the other hand, stands squarely in the shoes of ECI as its successor by merger, and is fully responsible for any liability of ECI at the Sites.

Although Raytheon is indisputably ECI's successor, and received notice from KDHE with regard to requested response actions at the Sites, Raytheon declined to cooperate with KDHE, leading, as we understand it, to the referral to EPA. In contrast, NCR met with KDHE and offered its cooperation even though we believe NCR has a complete defense to any liability claims at both Sites.

Denise Roberts June 26, 2009 page 3

As we were with KDHE, NCR is willing to discuss this matter with EPA and other PRPs in an attempt to resolve the public health issues at these Sites. We look forward to an opportunity to meet with you. Additionally, I want to let you know that in the next several days, NCR technical staff will reach out to EPA's designated contact persons for the Sites to learn more about the anticipated response actions.

Sincerely,

Langsam Stevens & Silver LLP

Larry Silver

cc:

David M. Traster, Esq.



Re: Radiation-Standard Precision, Inc. (Former) AR#62624 CONFIDENTIAL Administrative Record

Denise Roberts to: Pamela Houston

Cc: Megan Schuette, Jolleen Werst, DeAndre Singletary

09/26/2012 01:17 PM

Remove handwritten note at top of doc. 40348531- call me for reason if need one. Thanks. Rest is ok.

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Senior Assistant Regional Counsel
Office of Regional Counsel
U.S. Environmental Protection Agency
11201 Renner Road
Lenexa, Kansas 66219
roberts.denise@epa.gov
(913)551-7559

fax: (913)551-7925

Pamela Houston

Good Morning, The above AR has been created...

09/26/2012 11:19:51 AM

From:

Pamela Houston/R7/USEPA/US

To:

Megan Schuette/R7/USEPA/US@EPA, Denise Roberts/R7/USEPA/US@EPA

Cc:

Jolleen Werst/R7/USEPA/US@EPA, DeAndre Singletary/SUPR/R7/USEPA/US@EPA

Date:

09/26/2012 11:19 AM

Subject:

Radiation-Standard Precision, Inc. (Former) AR#62624 CONFIDENTIAL Administrative Record

Good Morning,

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Tracking Type: - enter AR and click the binoculars

select R07: AR# (ADMIN RECORD #)

click OK

Tracking Number: - enter 62624 and click the binoculars

select R07: 62624:

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Then click



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If you have corrections, additional documents you want to add please just let me know. (Please read the introduction page and make sure it is OK)



CONFIDENTIAL Superfund Acknowledgement Form.pdf

Pamela Houston US EPA Environmental Protection Specialist 901 N. 5th St. Kansas City, KS 66101 913-551-7699 913-551-9699 fax

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Environmental Protection Agency
Region 7
Superfund Division

11201 Renner Boulevard Lenexa KS 66219 Re: Doc id 114322

Megan Schuette to: Pamela Houston

09/11/2012 10:49 AM

Hi Pam,

I do not have a copy of figures 11 and 12. Someone else sent this document down to the records center - this document was already in SDMS when I was assigned the site.

Megan

Pamela Houston

Good Afternoon Megan, Can you log into SDMS and look up doc id 114322 an...

09/04/2012 02:18:02 PM

From:

Pamela Houston/R7/USEPA/US

To:

Megan Schuette/R7/USEPA/US@EPA 09/04/2012 02:18 PM

Date:

Subject:

Doc id 114322

Good Afternoon Megan,

Can you log into SDMS and look up doc id 114322 and let me know if you have a copy of figures 11 and 12?

Thanks

Re: 40346228 🗎

Megan Schuette to: Pamela Houston

09/11/2012 10:47 AM

Hi Pam,

I do have this CD. I will bring it to you at the RO tomorrow. Sorry about that.

Megan

Pamela Houston

Good Afternoon Megan, Can you look at Doc id 40346228 in SDMS and let me...

09/04/2012 02:42:09 PM

From:

Pamela Houston/R7/USEPA/US

To:

Megan Schuette/R7/USEPA/US@EPA 09/04/2012 02:42 PM

Date:

Subject:

40346228

Good Afternoon Megan,

Can you look at Doc id 40346228 in SDMS and let me know if you have a CD that should have accompanied this document?

Thanks

Megan Schuette to: Pamela Houston

09/06/2012 03:31 PM

Hi Pam,

Sorry I'm just getting back with you now. I'm on travel all week and haven't gotten a chance to get into SDMS. I've never done it remotely before but I'm assuming I should be able to and will try tonight. I may not have the answer to the CD question until I take a look at my desk. Please let me know if there is anything else you need.

Megan Schuette Federal On-Scene Coordinator U.S. EPA Region 7 (SUPR/PPSS) 901 N. 5th Street Kansas City, KS 66101 913-551-7630 (office) 913-375-5182 (cell)

Sent from my BlackBerry, please excuse any typos. Pamela Houston

---- Original Message -----

From: Pamela Houston

Sent: 09/04/2012 02:18 PM CDT

To: Megan Schuette Subject: Doc id 114322

Good Afternoon Megan,

Can you log into SDMS and look up doc id 114322 and let me know if you have a copy of figures 11 and 12?

Thanks